

As exemplified in Figures 1-4, an electric motor includes a stator plate core 4 with grooves 6 formed on its internal circumference. The core 4 having windings 8 fitted into the grooves 6. A rotor 12 is mounted inside the stator core 4 at a distance determined by an air gap 10. The rotor 12 rotates on an axle 14 that is supported by bearings 13. To prevent common mode leak currents or bearing currents, a shield 20 of conductive materials is fitted in the stator grooves 6. The shield is formed from a layered structure having a conductive layer and an insulating layer. The shield is formed of parallel strips in the depth of the groove between the conductive layer and the plate core.

Claim 1 broadly encompasses the aforementioned embodiment and recites, among other elements, that an electrically conductive shield is fitted between windings and a plate core, said shield comprising a number of parallel strips separated from each other and insulated from the plate core.

In the rejection, the Examiner applied the *Meyer* patent and in the alternative, the *Schuler* patent as primary references. The Examiner acknowledges that when taken individually both the *Meyer* and *Schuler* patents fail to teach or suggest that the electrically conductive shield strip are earthed or connected to the plate core, and relies on the *Hill* patent to allegedly remedy these deficiencies. Applicant submits, however, that neither the *Meyer* patent nor the *Schuler* patent teach all of the elements as alleged.

The *Meyer* patent, for example, discloses an electric machine having an electrically conducting outer glow-discharge protection layer 6 that is situated on an outer surface of a winding bar 3. The glow-discharge protection layer 6 is then covered by conductive wrapping 7 with a conductive adhesive 12 and/or conductive

cement 17 arranged there between. By virtue of this construction, it should be readily apparent to a skilled artisan that the *Meyer* patent fails to disclose or suggest at least that the shield is insulated from the plate core, as recited in claim 1. Rather, the *Meyer* patent teaches that a glow-discharge protective layer is covered by conductive wrappings 7 through the use of a conductive cement or adhesive.

The *Schuler* patent discloses an electrical machine having an electrically conductive strip 5 formed on opposite ends of a bar winding. By virtue of this configuration, the *Schuler* patent fails to disclose or suggest that the electrically conductive shield is fitted between the windings and the plate core, as recited in claim 1. Rather, the *Schuler* patent teaches a configuration which, at best, places electrically conductive strip on outer ends of a winding bar. As a result, the *Schuler* patent teaches a way from the aforementioned claim element.

The *Hill* patent fails to remedy the aforementioned deficiencies of either the *Meyer* patent or the *Schuler* patent. The *Hill* patent teaches an electric machine wherein stator cores are held in a slot by wedges and are provided with layers of high resistance material to surround the portion of the core sides lined within the slots. The Examiner alleges that the layer of high resistance material is analogous to the parallel strips of the conductive shield as recited in claim 1. Even if this interpretation is accurate, which Applicant believes it is not, this interpretation fails to remedy the deficiencies of the *Meyer* patent at least because the layers of higher resistance material are not originated between the winding and the core as defined in the claim. Regarding the *Schuler* patent, the *Hill* patent discloses that a damping layer which has conductive property is formed on the high resistant material layers 11. Thus, both the *Hill* patent and the *Schuler* patent teach away from having an

electrically conductive shield that is insulated from the plate core. For at least these reasons, the *Hill* patent fails to disclose or suggest any elements that may be combined, substituted, or integrated with or into either the *Meyer* or *Schuler* patent to achieve the claimed results.

In sum, the *Meyer*, *Schuler*, and *Hill* patent, either singularly or combined, fail to teach or suggest every element recited in the claims. Applicant submits, therefore, that a *prima facie* case of obviousness has not be established.

To establish *prima facie* obviousness of a claimed invention, all of the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). Moreover, obviousness "cannot be established by combining the teachings of the prior art to produce the claimed invention, absent some teaching or suggestion supporting the combination." ACS Hosp. Sys. V. Montefiore Hosp., 732 F.2d 1572, 1577, 221 USPQ 929, 933 (Fed. Cir. 1984). Applicant requests, therefore, that the rejection under 35 U.S.C. §103 be withdrawn and independent claim 1 and its corresponding dependent claims be allowed.

On page 4 of the Office Action, the Examiner indicated that claims 2, 6, 8, and 9 contain allowable subject matter. Applicant thanks the Examiner for this acknowledgement and believe that all claims are allowable for the reasons stated above.

By the foregoing remarks, Applicant submits that claims 1-9 are allowable, and this application is in condition for allowance. In the event that the Examiner believes that this application can be placed in even better form, the Examiner is invited to contact the undersigned at the number provided below.

Respectfully submitted,

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